

Modern Slavery and Human Trafficking Policy Statement

Londinium A & C LLP (Registration number OC310467), registered at Unit 1 Hetton Lyons Industrial Estate, Hetton Le Hole, Tyne & Wear, DH5 0RH (including **all** its trading subsidiaries, a list of which can be found within its annual financial statements which are available from Companies House) is committed to ensuring that there is no modern slavery or human trafficking in our European supply chains or in any part of our business.

Londinium A & C LLP (LON) group is a European wide entity operating in over 20 countries, employing in excess of 650 staff and currently has turnover in excess of €140M .

Our supply includes supply of food stuffs for the retail market in various guises.

Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain Imported goods from sources outside the UK & EU are more at risk from slavery/trafficking issues and as such, as much of our product is sourced from the EU where possible and care is taken when items are sourced outside this area.

Our Commitment

LON has a zero tolerance to slavery and human trafficking and disciplinary procedures would be taken against any staff going against this policy and breaching the Act.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our individual business units.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk HR and the directors have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Where possible we build long standing relationships with reputable suppliers. We expect all those in our supply chain and contractors to comply with our values.

Training

Each site will be responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

HR in conjunction with the specific site will ensure employees receive an induction into the business where our policies, procedures and expectations are outlined.

Our effectiveness in combating slavery and human trafficking

LON uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

HR in conjunction with the sites will conduct labour monitoring, right to work documentation and payroll audits.

The Purchasing teams will undertake a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.

The Technical department will regularly review policies from Ethical Policy (POL004) including ethical systems such as Sedex in the UK and associated codes of conduct, POL26 Product Authenticity, Claims, TACCP and Chain of Custody Policy (POL026), through the Supplier approval system (TEC002) in the Supplier Audit Questionnaire and physical audit and our working practices which show our commitment.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the current financial year (December 2018). The policy will be reviewed, as a minimum, on an annual basis to ensure the statement is up to date.

Reporting suspicions of slavery

Employees can report any suspicions of slavery either through the Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

<https://modernslavery.co.uk/contact.html>
0800 0121 700

LONDINIUM A&C LLP



Ralph Buchholz
Designated Member

Last updated: 31 March 2019 in respect of financial year 31 December 2018